

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X
IN RE APPLICATION OF APOSTOLOS :
MANGOURAS, for an Order Pursuant to :
28 U.S.C. §1782 to Conduct Discovery for Use :
in Foreign Proceedings :
: 17-MC-172
-----X

NOTICE OF MOTION TO COMPEL

PLEASE TAKE NOTICE, pursuant to this Honorable Court's order dated June 19, 2017 and Federal Rule of Civil Procedure 37, Applicant Apostolos Mangouras will move before the Honorable United States District Judge P. Kevin Castel, 500 Pearl Street, Courtroom 11D at a date and time to be determined by the Court for an Order compelling Respondents Squire Patton Boggs LLP and Brian Starer Esq. to produce the documents set forth in the subpoenas duly served upon them pursuant to 28 U.S.C. § 1782 and Federal Rule of Civil Procedure 45.

In support of this Motion to Compel, Applicant submits herewith a Memorandum of Law, Declaration of Thomas L. Tisdale dated June 23, 2017 and a Declaration of Maria Jose Rodriguez Docampo dated June 23, 2017 together with supporting exhibits thereto. The previously submitted declarations of Jose Maria Soroa and Santiago Zabaleta are also incorporated and referenced in this renewed Application.

Dated: New York, NY
June 26, 2017

Respectfully submitted,
Attorneys for Apostolos Mangouras,

By: /s/Thomas L. Tisdale
Thomas L. Tisdale (TT5263)
Timothy J. Nast (TN 8578)
Tisdale Law Offices, LLC
60 East 42nd St., Suite 1638
New York, NY 10165
Tel: 212 354 0025
Fax: 212 869 0067
ttisdale@tisdale-law.com
tnast@tisdale-law.com

CERTIFICATE OF SERVICE

I hereby certify that on June 26, 2017 a copy of the foregoing was filed electronically and e-mailed to counsel of record. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system.

/s/Thomas L. Tisdale
Thomas L. Tisdale